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RASH CURTIS & ASSOCIATES and
7 CREDIT BUREAU OF UKIAH, INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10
11 DONNA BURTON,

12 Plaintiff,

13 vs.

14 RASH CURTIS & ASSOCIATES;
15 CREDIT BUREAU OF UKIAH, INC.;
16 And DOES 1 – 10 inclusive,

17 Defendant(s).
18

CASE NO:

Mendocino County Case No. MC UK CVC
1720536

**DEFENDANTS, RASH CURTIS &
ASSOCIATES AND CREDIT BUREAU OF
UKIAH, INC.'S, NOTICE OF REMOVAL**

19 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

20 PLEASE TAKE NOTICE that Defendants RASH CURTIS & ASSOCIATES AND
21 CREDIT BUREAU OF UKIAH, INC., hereby removes to the Court, the state court action
22 described below:

23 1. On November 29, 2017, an action was commenced in Superior Court, State of
24 California, Mendocino County, entitled DONNA BURTON, Plaintiff, v. RASH CURTIS &
25 ASSOCIATES; CREDIT BUREAU OF UKIAH, INC., Defendants as case number MC UK CVC
26 1720536.

27 2. On or about December 1, 2017, RASH CURTIS & ASSOCIATES and CREDIT
28 BUREAU OF UKIAH, INC., were served with the Summons and Complaint, attached hereto as

1 **Exhibit A.**; consequently, the timing of this removal is proper. *See* **28 U.S.C. § 1446(b)(1)**. The
2 contents of **Exhibit A** represents all process, pleadings, and orders served upon RASH CURTIS
3 & ASSOCIATES and CREDIT BUREAU OF UKIAH, INC. in the original state court matter.

4 3. This Court has jurisdiction to hear this case because this action is a civil action of
5 which this Court has original jurisdiction under **28 U.S.C. § 1131**, and is one which may be
6 removed to this Court by Defendants pursuant to the provisions of **28 U.S.C. § 1441(a)** in that it
7 arises under the federal Fair Debt Collection Practices Act (**15 U.S.C. § 1692, et seq.**), the federal
8 Telephone Consumer Protection Act (**47 U.S.C. § 227, et seq.**).

9
10 DATED: December 18, 2017

BERMAN BERMAN BERMAN
SCHNEIDER & LOWARY, LLP

11
12 By: /s/Amanda N. Griffith
13 MARK E. LOWARY, ESQ.
14 DAVID R. CASADY, ESQ.
15 AMANDA N. GRIFFITH, ESQ.
16 Attorneys for Defendants
17 RASH CURTIS & ASSOCIATES and
18 CREDIT BUREAU OF UKIAH, INC.
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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
 COUNTY OF PLACER)

I am employed in the County of Placer, State of California. I am over the age of 18 and not a party to the within action. My business address is 2390 Professional Drive, Roseville, California 95661.

On December 18, 2017, I served the foregoing document described as "**DEFENDANTS, RASH CURTIS & ASSOCIATES AND CREDIT BUREAU OF UKIAH, INC.'S, NOTICE OF REMOVAL**" on the interested parties in this action by placing a [X] true copy thereof [] the original document enclosed in a sealed envelope addressed as follows:

[SEE ATTACHED SERVICE LIST]

X **(BY MAIL)** In accordance with the regular mail collection and processing practices of this business office, with which I am familiar, by means of which mail is deposited with the United States Postal Service at Roseville, California that same day in the ordinary course of business, I deposited such sealed envelope for collection and mailing on this same date following ordinary business practices.

 (BY ELECTRONIC MAIL) Based on the parties' agreement to accept service by electronic transmission, I sent the above document(s) to the person(s) at the electronic address(es) noted in the attached service list from my electronic service address which is "damain@b3law.com"

 (BY OVERNIGHT MAIL)

 I caused such envelope to be delivered by hand to the office of the addressee, either by overnight delivery via Federal Express or Overnite Express.

 (BY PERSONAL SERVICE)

- By personally delivering copies to the person served.
- I delivered such envelope by hand to the office of the addressee pursuant to C.C.P. Section 1011.
- I caused such envelope to be delivered by hand to the office of the addressee, by local courier service.
- I caused such envelope to be delivered to the office of the addressee, by telecopier or facsimile machine. Proof of such delivery is attached hereto.

STATE

X I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 18, 2017, at Roseville, California.

Debbie Main
 Name


 Signature

Service List

Burton vs. Rash Curtis & Associates, et al.
Mendocino County Superior Court
Case No: MC UK CVC 1720536

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